

USDC - BALTIMORE
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DR. KEENAN COFIELD, JD/Ph.D/Psy.D/DD
and The Supreme GRAND Bishop-Cofield
et. al.

PLAINTIFF(S)/CLAIMANTS

Vs

CASE NUMBER: 1:22-cv-00727-(ELH)

WORKTIME, INC.

On their own

THE PROGRESSIVE CORPORATION, et. al.

DEFENDANTS

**TO: CLERK OF COURT
PLEASE ISSUE SUMMONS FOR NEW
DEFENDANTS**

**PLAINTIFF(S) AMEND COMPLAINT TO ADD DEFENDANTS THE HERTZ
CORPORATION, ABE ESSEX, LLC AND AUTO BODY EVOLUTION, LLC,
AND DENNIE HUFF AS DEFENDANTS**

COMES now the Defendants Dr. Keenan Cofield, Kayla Nedd, and LaVerne Thompson, in the above styled matter seeking to AMEND the Original Complaint and Add several NEW Defendants to this action, as they are related and/or associated with the current cause of action and each NEW Defendant named below is a indispensable party Defendant and is necessary to be added and included herein, pursuant to Federal Rules of Civil Procedure, Rule 15(a)(1), and says the following:

1). That the Clerk of this Honorable Court should issue a SUMMONS for each Defendant named below, and each NEW Defendant shall be a party ONLY as to COUNT 9 in this case. That this

NEW Count or COUNT 9, is included in this action and further incorporated in this action, as set forth herein.

1). **THE CORPORATION TRUST, INC.**
C/O THE HERTZ CORPORATION
2405 YORK RD.
SUITE 201
LUTHERVILLE, MD 21093

2). **THE CORPORATION TRUST, INC.**
C/O THE HERTZ CORPORATION
1777 E. JOPPA RD.
BALTIMORE, MD 21234

3). **THE CORPORATION TRUST, INC.**
C/O THE HERTZ CORPORATION
660 MADISON AVE.
NEW YORK, NY 10021

4). **ABE ESSES, LLC**
AUTO BODY EVOLUTION, LLC
1751 E. JOPPA RD.
C/O DENNIE HUFF, RESIDENT AGENT
BALTIMORE, MD 21234

5). **ABE ESSEX, LLC.**
C/O DENNIE HUFF, RESIDENT AGENT
1751 E. JOPPA RD.
BALTIMORE, MD 21234

COUNT 9
JOINT STATEMENT OF THE CASE AND FACTS

6). On or about the 9/7/2021, the Plaintiff Dr. Keenan Cofield had auto body work performed at Auto Body Evolution in Middlesex, when these Defendants specifically, did knowingly, willingly, purposely, negligent to commit fraud, gave the Plaintiff back his vehicle, took the \$500.00 deductible, illegally billed GEICO my insurance company, knowing that had not completed the work, (ie, the grille, and the inside Sun visor Cover) to date was never placed on

the car charging GEICO thousands of dollars for the repairs, and never calling the Plaintiff to come into the shop to complete the process, after for several weeks into months back and forth, the Plaintiff called ABE and have filed complaints with GEICO about the refusal and failure of ABE to complete repairs on my vehicle. The ABE Defendants misrepresented to GEICO they had completed the work, when they had not done so. Additionally, upon inspection of the vehicle hood it was determine there were still spots or places not painted during the initial repairs on plaintiff's vehicle by ABE. To date the Plaintiff has not been refunded his deductible from these Defendants or Progressive Insurance. These Defendants action amount to straight out insurance fraud against GEICO. These Defendants should refund back all the Plaintiff(s) money including the deductible. The Plaintiff Cofield has suffered greatly as a result of this negligent to fraudulent conduct of these Defendants. (See Attached ABE/Invoice)

7). Additionally, the Plaintiff rented two separate vehicles from Hertz Rental Car dating back prior to 08/19/2021. The HERTZ Defendants and their employees, staff and management, billed the Plaintiff for unwanted charges and services. The Plaintiff never signed either the FIRST Contract nor the SECOND contract receipts attached. (See Exhibit B/Hertz Bill) At NO time did the Plaintiff requested, signed or needed any insurance coverage at all as falsely charged and indicated. The Hertz Defendants, did knowingly, willingly, purposely, negligently committed fraud, and/or fraudulent acts or conduct when they illegally charged and/or overcharged my credit card for services never requested, as this was a scam by Hertz and their staff. The Plaintiff filed several internal complaints with Hertz and his bank, with NO actions taken.

WHEREFORE, GOOD CAUSE SHOWN, the Plaintiff demands Compensatory Damages in the amount of \$250,000 Dollars, against each named NEW Defendant(s) The Hertz Corporation and

ABE Essex, LLC. et. al., and \$1,500,000 Dollars in Punitive Damages against these same Defendants named herein. The Plaintiff seeks any and all other RELIEF this Honorable Court deem to grant and/or award to the plaintiff. The Plaintiff Dr. Cofield, is always willing to listen and review any fair, but reasonable settlement offer. to resolve this matter. THESE DEFENDANTS WERE WRONGDOERS, and injured and took advantage of the Plaintiff because he was Black, and race was yet another factor for the White Defendants illegal to wrongful conduct.

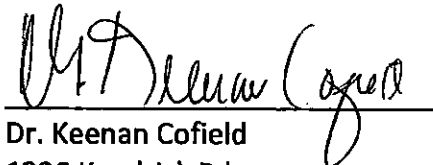
DEMAND TRIAL BY JURY ON THIS COUNT AS WELL INVOLVING THESE DEFENDANTS.

This the 8th day of April, 2022.

STATE OF MARYLAND

BALTIMORE COUNTY

WITNESS MY HAND this the 8th day of April, 2022,



Dr. Keenan Cofield
1236 Kendrick Rd.
Rosedale, MD 21237
443-554-3715
EMAIL: Supremegrandbishop@gmail.com

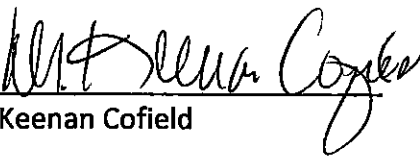
Dated this the 8th day of April, 2022



Dr. Keenan Cofield

CERTIFICATE OF SERVICE

I do hereby certify that a copy of the above and foregoing has been filed, HAND-DELIVERED and served upon the US District Court in Baltimore, MD, and any and ALL other Defendants or Defendants Counsel on this the 8th day of April, 2022, and/or placed in the United States mail postage prepaid, to all Defendants so served, and served by this Court via the CM/ECF electronic service system of this Court. **This AMENDED COMPLAINT shall be SERVED upon the NEW Defendants.**


Dr. Keenan Cofield